

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**PD HOMECARE ASSOCIATES, LLC
dba LIKEN HOME CARE**

Plaintiff,

JURY DEMAND

CIVIL 2:24-cv-00774-AJS

vs.

UNITED STATES OF AMERICA

Defendant.

JOINT STIPULATION TO EXTEND DEFENDANT’S DEADLINE TO ANSWER

Plaintiff PD Home Care Associates, LLC dba Liken Home Care and Defendant United States of America, by and through their respective counsel, stipulate under Local Civil Rule 7(E) that Defendant has an additional thirty (30) days, or until September 3, 2024¹ to respond to Plaintiff’s Complaint,.

More specifically:

1. On May 24, 2024, Plaintiff filed its Complaint for this Civil Action before this Court.
2. On May 28, 2024, this Court issued the Summons to the Defendant for this Civil Action.
3. On May 30, 2024, Plaintiff mailed the Defendant with the Court-issued Summons and filed its Certificate of Service with the Court.

¹ September 3, 2024 is the next business day after the thirty-day extension.

4. Plaintiff and Defendant agree that the deadline, without any extension, for the Defendant to serve its Answer is August 1, 2024. *See* Fed R. Civ. P. 6(d) (adding three days to response time when service is by mail or other means consented to)
5. On May 31, 2024, this Court issued a notice that this Civil Action had been designated for placement into the United States District Court for the Western District of Pennsylvania's Alternative Dispute Resolution (ADR) program.
6. On June 20, 2024, Defendant's counsel first contacted Plaintiff's counsel to discuss the case and to request an extension of time to file Defendant's Answer, as Defendant's counsel was (and is) still waiting for information from the Defendant's Agency, the Internal Revenue Service (the "IRS").
7. Since June 20, 2024, counsel for Plaintiff and Defendant have had on-going conversations related to the facts and issues of this case and the process by which the claims of Plaintiff's May 24th Complaint could be settled.
8. Counsel for Plaintiff and Defendant will continue to discuss the claims of Plaintiff's May 24th Complaint in the interest of facilitating settlement and expediting disposition of the action as appropriate.

Dated: July 26, 2024

Respectfully submitted,

/s/ **Justin H. DiLauro**
JUSTIN H. DILAURO, ESQ.
Sr. Tax Attorney and Owner/Manager
DiLauro Tax Law PLLC
9639 Hillcroft Street, Suite 844
Houston, Texas 77096
(888) 463-5829
(713) 456-2027 (fax)
JHD@DiLauroTaxLaw.com

USDC PAWD (Admitted 5/15/2024)
USDC TXSD No: 3865386
Texas State Bar No: 24055404

Counsel for Plaintiff
PD Homecare Associates, LLC dba
Likem Home Care

/s/ **Stephen S. Ho**
STEPHEN S. HO (NY 5173083)
Trial Attorney, Tax Division
U.S. Department of Justice
Post Office Box 227
Washington, D.C. 20044
Tel.: (202) 616-8994
Fax: (202) 514-6866
Stephen.S.Ho@usdoj.gov

Counsel for Defendant
United States of America

CERTIFICATE OF SERVICE

I certify that on July 26, 2024, I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Western District of Pennsylvania, using the electronic case filing (ECF) system of the Court, and thereby served it on all counsel of record in this case.

/s/ **Justin H. DiLauro**
JUSTIN H. DILAURO, ESQ.